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Counsel for Plaintiff, PacketFabric, Inc.

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

PACKETFABRIC, INC.,

Case No. 2:24-cv-00618-GMN-EJY

Plaintiff,

V.

DAVID WARD, an individual; ROE ENTITIES I through X; and DOES I through X, inclusive.

Defendants.

STIPULATION TO EXTEND TIME FOR DEFENDANT TO RESPOND TO
PLAINTIFF'S COMPLAINT

Pursuant to Local Rule 7-1, Plaintiff PACKETFABRIC, INC. (“Plaintiff”) and Defendant DAVID WARD (“Defendant”) by and through their respective counsel (collectively, the “Parties”), hereby stipulate and agree as follows:

WHEREAS, the Complaint in this matter was filed on February 23, 2024, and served on Defendant on February 27, 2024; and

WHEREAS, this case was removed to this federal court on March 28, 2024 when
a Petition for Removal and related pleadings were filed by Defendant; and

1 WHEREAS prior to removal of the case, the Parties stipulated to extend the time
2 for a response to the Complaint to be filed and served to April 16, 2024 in order to allow
3 the Parties to engage in discussions about resolution of the case; and

4 WHEREAS the Parties have reached a tentative agreement which is in the process
5 of being reduced to a written release agreement;

6 WHEREAS it has taken more time than anticipated to finalize the written
7 settlement agreement; and

8 WHEREAS, there has been one prior extension of the deadline for Defendant's
9 response to the Complaint;

10 NOW, THEREFORE, Plaintiff and Defendant stipulate and agree that good cause
11 exists for an extension of time for Defendant to respond to Plaintiff's Complaint until
12 **May 7, 2024.**

13 **IT IS SO STIPULATED.**

14 DATED this 16th day of April, 2024

15 **KLINEDINST PC**

16 */s/Teresa M. Beck*
17 TERESA M. BECK, ESQ.
Nevada Bar No. 15011
501 West Broadway, Suite 1100
San Diego, California 92101
Email: tbeck@klinedinstlaw.com

20 **Counsel for Defendant**

16 DATED this 16th day of April, 2024

15 **GREENBERG TRAURIG, LLP**

16 */s/Eric Swanis*
17 ERIC W. SWANIS, ESQ.
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22 **Counsel for Plaintiff**

23 **IT IS SO ORDERED.**

24 
25 THE HONORABLE ELAYNA J. YOUCRAH
United States Magistrate Judge

27 Date: April 16, 2024